

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Tri Fund Development LLC Case No. 15-4492 Chapter 11

All Cases: Moving Creditor Urban Partnership Bank Date Case Filed 2/11/2015

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed _____

Chapter 7: ☐ No-Asset Report Filed on _____

☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral

a. ☐ Home

b. ☐ Car Year, Make, and Model _____

c. ☒ Other (describe) Real estate not owned by Debtor

2. Balance Owed as of Petition Date \$ 1,784,003.25

Total of all other Liens against Collateral \$ 0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 103,000

5. Default

a. ☒ Pre-Petition Default

Number of months 36 Amount \$ \$1,784,003.25

b. ☐ Post-Petition Default

i. ☐ On direct payments to the moving creditor

Number of months _____ Amount \$ _____

ii. ☐ On payments to the Standing Chapter 13 Trustee

Number of months _____ Amount \$ _____

6. Other Allegations

a. ☐ Lack of Adequate Protection § 362(d)(1)

i. ☐ No insurance

ii. ☐ Taxes unpaid Amount \$ _____

iii. ☐ Rapidly depreciating asset

iv. ☐ Other (describe) _____

b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c. ☐ Other "Cause" § 362(d)(1)

i. ☐ Bad Faith (describe) _____

ii. ☐ Multiple Filings

iii. ☐ Other (describe) _____

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention Filed

Date: 3/11/2015

/s/ Patrick M. Jones

Counsel for Movant